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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In Re:

PG&E CORPORATION

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

Bankruptcy Case No. 19 - 30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**DECLARATION OF PEGGY
O'LAUGHLIN IN SUPPORT OF SOUTH
SAN JOAQUIN IRRIGATION DISTRICT'S
MOTION FOR RELIEF FROM THE
AUTOMATIC STAY TO PERMIT
PROCEEDINGS IN NON-BANKRUPTCY
FORUM TO CONTINUE**

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Judge: Hon. Dennis Montali

Date: March 25, 2020

Time: 10:00 a.m.

Place: United States Bankruptcy Court
450 Golden Gate Ave., 16th Flr, Crt. 17
San Francisco, CA 94102

Objection Deadline:

March 20, 2020 at 4:00 p.m. (PT)

1 I, Peggy O'Laughlin, declare as follows:

2 1. I am a partner with the law firm of Matteoni, O'Laughlin & Hechtman, counsel
3 for Party-in-Interest South San Joaquin Irrigation District ("the District"). I make this declaration
4 in support of the *Motion of South San Joaquin Irrigation District for Relief from the Automatic*
5 *Stay to Permit Proceedings in Non-Bankruptcy Forum to Continue* ("Motion"). Capitalized
6 terms that are not defined herein are defined in the Motion.

7 2. In the LAFCo Action, *Pacific Gas & Electric v. San Joaquin Local Agency*
8 *Formation Commission; South San Joaquin Irrigation District et al.*, Case No. STK-CV-UJR-
9 2015-000-1266, the District filed its notice of appeal of the LAFCo Judgment invalidating the
10 SJ LAFCo Approval in the trial court on November 21, 2107, and it was lodged with the Court
11 of Appeal of the State of California, Third Appellate District on November 29, 2017 (Case No.
12 C086008). On November 29, 2017 PG&E filed its cross appeal challenging the Superior
13 Court's rulings in the District's favor.

14 3. The Third Appellate District's Docket for the LAFCo Appeal shows that the
15 District's Appellant's opening brief was filed on August 2, 2018 and PG&E's Respondent's
16 brief and cross-appellant's opening brief was filed on January 28, 2019. *See* Exhibit 5 to the
17 District's Request for Judicial Notice ("RJN"), which is a true and correct copy of the court's
18 docket for such case.

19 4. At the time the Court of Appeals stayed this appeal as a result of PG&E's
20 bankruptcy filing, the briefing in the LAFCo Appeal was close to completion. The only briefs
21 remaining to be filed were the District's combined reply and cross-respondent's brief and
22 PG&E's cross-appellant reply brief.

23 5. In the Eminent Domain Action, *South San Joaquin Irrigation District v. Pacific*
24 *Gas And Electric Company et al.*, Case No. STK-CV-UED-2016-0006638, the District filed its
25 notice of appeal of the trial court's Judgment dismissing the action with the trial court on
26 January 18, 2018 and it was lodged with the Court of Appeal of the State of California, Third
27 Appellate District on January 22, 2018 (Case No. C086319).
28

6. The Third Appellate District's Docket for the Eminent Domain Appeal shows that the District's Appellant's opening brief was filed on July 19, 2018 and PG&E's Respondent's brief was filed on January 28, 2019. *See* Exhibit 8 to the District's RJN, which is a true and correct copy of the court's docket for such case.

7. At the time the Court of Appeals stayed this appeal as a result of PG&E's bankruptcy filing, there was only one brief remaining to be filed in the Eminent Domain Appeal, the District's reply brief, originally due to be filed on April 22, 2019.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed in San Jose, California on March 4, 2020.


Peggy O'Laughlin